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Subject: FW: Docket No. 03-RPS-1078

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California Energy Commission RE: Docket No. 03-RPS-1078 Docket Unit MS-4

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Attached, please find a document entitled "National Consumer-Owned Power Wholesale Renewable Energy Credit Certification Guidelines." This document was prepared through a collaborative process involving representatives from the Western Area Power Administration, Bonneville Power Administration, National Rural Electric Cooperative Association, and the American Public Power Association; as well as several western-based consumer-owned utilities, including Tri-State, Basin Electric, Los Angeles Department of Water and Power, Plumas Sierra Electric Power Cooperative, Northern California Public Power Agency, Arizona Power Authority, Colorado River Commission, Nebraska Public Power District, among others such as EnerVision and AWS Scientific.

These guidelines represent the fundamental criteria needed to identify and track renewable energy credits. It is our hope that the Western Regional Energy Generation Information System (WREGIS) final plan avoid extraneous requirements that do not directly relate to the generation of renewable energy. The guidelines we've created through this collaborative process also reflect the National Association of Attorneys General Guidelines on Environmental Marketing. It is extremely important to the family of consumer-owned utilities to ensure reasonable program and administrative cost-containment; and the broadest possible participation among consumer-owned utilities. Once the basic WREGIS program is constructed and functioning with broad participation, phase II, III, etc., can incorporate other ancillary tracking services that could be offered to participants as options. Thus, participants can pay for what they want and need.

In the near future, Western Area Power Administration will be releasing an RFI on behalf of consumer-owned utilities to review qualifications and proposed implementation and teaming strategies of contractors capable of performing Renewable Energy Credit Tracking, Certification and Marketing. At some point, we hope there is an opportunity for our consumer-owned utility effort to collaborate with WREGIS. Through our combined efforts we may be able to develop a far better program than each of us might if we follow independent paths.